

EXHIBIT B

Exhibit B: Defendants' Proposed Constructions

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
<u>1. Dynamic Replication:</u>			
1a	“dynamically replicated” and/or “dynamically replicating”	<p>1, 20, 31</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 7/28/98 Examiner interview; 8/7/98 Amendment; Special Edition Using Netscape 2; 12/21/98 Notice of Allowance.</p> <p><u>Patent:</u> 12:23-45; 18:60-19:63; 22:28-23:3; 23:14-51; 25:63-66; Figs. 12-13n 15-16; Claims 1, 20, 31.</p> <p><u>Geomas Claim Construction order</u> Pages 21-25</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 23-26</p> <p><u>Geomas' Reply Claim Construction brief</u> Pages 8-10</p>	Automatically copying within the database at the time of a search rather than at a time established in advance

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
<p>1b</p> <p>“wherein within said hierarchy of geographic areas at least one of said entries associated with a broader geographical area is dynamically replicated into at least one narrower geographical area”; and/or</p> <p>“wherein at least one of said entries in said geographical area of relatively larger expanse is dynamically replicated into at least one of said geographical areas of smaller expanse”; and/or</p> <p>“dynamically replicating an entry from broader geographical area into said geographical search area”</p>	1, 20, 31	<p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 7/28/98 Examiner interview; 8/7/98 Amendment; Special Edition Using Netscape 2; 12/21/98 Notice of Allowance.</p> <p><u>Patent:</u> 12:23-45; 18:60-19:63; 22:28-23:3; 23:14-51; 25:63-66; Claims 1, 20, 31; Figs. 12-13, 15-16.</p> <p><u>Geomas Claim Construction order</u> Pages 21-25</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 23-26</p> <p><u>Geomas' Reply Claim Construction brief</u> Pages 8-10</p>	<p>Automatically copying at least one entry associated with a broader geographical area within the database into a narrower geographical search area within the database at the time of a search rather than at a time established in advance (Claim 1, 20)</p> <p>Automatically copying an entry associated with a broader geographical area within the database into a narrower geographical search area within the database at the time of a search rather than at a time established in advance (Claim 31)</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
<u>2. Geographical Areas and/or Geographical Hierarchies:</u>			
2a	<p>“narrower geographical area”; and/or</p> <p>“geographical area of relatively smaller expanse”</p>	<p>1, 20</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 8/10/98 Response to Office Action; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 3:18-24; 3:34-39; 3:46-56; 8:22-36; 8:49-9:4; 11:34-12:32; 18:60-19:63; Figs. 2A, 12 and 13; Table 7; Claims 1, 20.</p> <p><u>Geomas Claim Construction order</u> Pages 8-10</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p>	<p>A geographic area within the database encompassed by a broader geographic area within the database</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
2b	<p>“broader geographical area”; and/or</p> <p>“geographical area of relatively larger expanse”</p>	<p>1, 20, 31</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 8/10/98 Response to Office Action; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 3:18-24; 3:34-39; 3:46-56; 8:22-36; 8:49- 9:4; 11:34-12:32; 18:60-19:63; Figs. 2A, 12 and 13; Table 7; Claim 1, 20, 31</p> <p><u>Geomas Claim Construction order</u> Pages 8-10</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p>	<p>A geographic area within the database that encompasses one or more narrower geographic areas within the database</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
2c	“hierarchy of geographical areas”	<p>1, 20</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 8/10/98 Response to Office Action; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 3:18-24; 3:34-39; 3:46-56; 8:22-36; 8:49-9:4; 11:34-12:32; 18:60-19:63; Figs. 2A, 12 and 13; Table 7; Claims 1, 20</p> <p><u>Geomas Claim Construction order</u> Pages 8-10</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p> <p><u>Other:</u> Dictionary of Computing, Prentice Hall (1992).</p>	Related geographical areas, ordered such that broader geographic areas encompass narrower geographic areas

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
2d	“geographical search area”	<p>1, 9, 10, 13, 20, 31, 34, 37</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 8/10/98 Response to Office Action; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 3:9-14; 3:18-24; 3:34-39; 3:46-56; 7:11-21; 8:22-36; 8:49-9:4; 11:34-12:32; 18:60-19:63; Figs. 2A, 12 and 13; Table 7; Claims 1, 9-10, 13, 20, 31, 34, 37.</p> <p><u>Geomas Claim Construction order</u> Pages 19-20</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 22</p>	The particular geographical area within the database selected by the search engine whose entries are to be searched.

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
2e	<p>“database of information organized into a hierarchy of geographic areas”; and/or</p> <p>“database of information organized into a predetermined hierarchy of geographical areas”; and/or</p> <p>“wherein said geographical areas are hierarchically organized”</p>	<p>1, 20, 32</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 8/10/98 Response to Office Action; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 3:18-24; 3:34-39; 3:46-56; 8:22-36; 8:49-9:4; 11:34-12:32; 18:60-19:63; Figs. 2A, 12 and 13; Table 7; Claims 1, 9-10, 13, 20, 31, 34, 37</p> <p><u>Geomas Claim Construction order</u> Pages 11-13</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p> <p><u>Other:</u> Dictionary of Computing, Prentice Hall (1992).</p>	<p>Entries are ordered into geographic areas within the database , such that a broader geographic area encompasses narrower geographic areas.</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
2f	“organizing a database of on-line information into a plurality of geographical areas”	<p>31</p> <p><u>File History:</u> 11/22/97 Election/ Restriction Requirement; 1/7/98 Response to Restriction Requirement; 2/10/98 Office Action; 8/10/98 Response to Office Action; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 3:18-24; 3:34-39; 3:46-56; 8:22-36; 8:49-9:4; 11:34-12:32; 18:60-19:63; Figs. 2A, 12 and 13; Table 7; Claim 31.</p> <p><u>Geomas Claim Construction order</u> Pages 14-15</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p>	<p>At the time the database is being organized, ordering entries of on-line information into geographic areas within the database</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
<u>3. Topics:</u>			
3a	“topics” and/or “topic” and/or “topically”	<p>1, 18, 20, 24, 31, 34, 36, 37, 38</p> <p><u>File History:</u> 2/10/98 Office Action; 8/10/98 Amendment; 12/9/98 Search Request.</p> <p><u>Patent:</u> [57]; 2:39-58; 2:63-3:30; 3:56-65; 4:13-24; 4:46-5:2; 5:6-65; 7:5-29; 8:22-36; 8:49-9:67; 10:1-30; 12:25-32; 14:14-15:52; 15:53-63; 16:7-26; 16:27-65; 17:42-45; 18:59-19:63; 20:44-65; 21:58-22:27; 23:14-51; 24:28-43; Figs. 2A-C, 3-8, 10, 13-14, 16-18; Tables 5-9; Claims 1, 15-16, 18, 20, 24-27, 31, 34-38.</p> <p><u>Geomas Claim Construction order</u> Pages 17-18</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 17-19</p>	An independent, searchable category of related goods or services, as distinguished from geographic information and the entries or data records associated with that category.

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
<p>3b</p> <p>“entries corresponding to each one of said hierarchy of geographical areas is further organized into topics”; and/or</p> <p>“entries corresponding to each of said hierarchy of geographical areas is further organized into topics”; and/or</p> <p>“organizing said entries corresponding to said plurality of geographical areas into one or more topics”</p>	1, 20, 31	<p><u>File History:</u> 2/10/98 Office Action; 8/10/98 Amendment; 12/9/98 Search Request.</p> <p><u>Patent:</u> [57]; 2:39-58; 2:63-3:30; 3:56-65; 4:13-24; 4:46-5:2; 5:6-65; 7:5-29; 8:22-36; 8:49-9:67; 10:1-30; 12:25-32; 14:14-15:52; 15:53-63; 16:7-26; 16:27-65; 17:42-45; 18:59-19:63; 20:44-65; 21:58-22:27; 23:14-51; 24:28-43; Figs. 2A-C, 3-8, 10, 13-14, 16-18; Tables 5-9; Claims 1, 15-16, 18, 20, 24-27, 31, 34-38.</p> <p><u>Geomas Claim Construction order</u> Pages 17-18</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 17-19</p>	<p>After the database is geographically ordered, further ordering the database entries for each particular geographic area into topics that are associated with that particular geographic area (as distinguished from geographically differentiated listings for the same topic)</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
<u>4. Miscellaneous:</u>			
4a	“on-line information”	<p>31</p> <p><u>File History:</u> 2/10/98 Office Action; Special Edition Using Netscape 2; 8/10/98 Amendment; 12/9/98 Search Request; 12/21/98 Reasons for Allowance.</p> <p><u>Patent:</u> 1:13 to 2:39; 2:59 to 3:14; 3:31-45; 3:66 to 4:39; 5:66 to 7:29; Fig. 1; Claim 31.</p> <p><u>Geomas Claim Construction order</u> Pages 13-14</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p>	Information that is remotely accessible over a network.

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
4b	“organizer”	<p>1</p> <p><u>File History:</u> 2/10/98 Office Action; Special Edition Using Netscape 2; 8/10/98 Amendment; 12/9/98 Search Request; 12/21/98 Reasons for Allowance</p> <p><u>Patent:</u> 1:6-10; 2:20-58; 4:13-23; 6:15-31; 6:46-57; 7:5 to 8:21; 9:55-67.</p> <p><u>Geomas Claim Construction order</u> Pages 25-28</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 9-10</p> <p><u>Geomas' Reply Claim Construction brief</u> Pages 1-3</p>	<p>A network interface (comprising a database and a search engine) that organizes ‘on-line information’ into categorized listings to make finding information easier.</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
4c	“database”	<p>1, 20, 31</p> <p><u>File History:</u> 11/22/97 Election/Restriction</p> <p><u>Patent:</u> 3:34-36; 11:21-33; 12:53-59; 14: 66-15:14; 18:10-22; 18: 60-63; 19:29-45; Figs. 2-8, 13.</p> <p><u>Geomas Claim Construction order</u> Pages 10-11</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 10-17</p> <p><u>Other:</u> Dictionary of Computing, Prentice Hall (1992).</p>	<p>A data structure of ordered entries separate from the user's browser that is accessed by the search engine to search geographically and topically</p>

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
4d	“entries” and/or “entry”	<p>1, 18, 20, 24, 31, 36</p> <p><u>File History:</u> 2/10/98 Office Action; Special Edition Using Netscape 2; Summary of 7/28/98 Examiner Interview; 8/10/98 Amendment; 12/9/98 Allowance</p> <p><u>Patent:</u> 9:55-67; 11:30-33; 12:23-45; 15:5-25; 16:22-26; 17:27-35; 18:60-66; 19:29-63; 20:46-65; 23:15-16; 23:30-51; 24:29-43; 26:24-26; 27:3-6; Tables 6, 7, 8, 9; Figs. 13, 14, 16, 17, and 19; Claims 1, 17-18, 20, 23-24, 26-27, 31, 36, 39.</p> <p><u>Geomas Claim Construction order</u> Pages 15-17.</p> <p><u>Geomas' Opening Claim Construction brief</u> Pages 1-5, 17-19</p> <p><u>Geomas' Reply Claim Construction brief</u> Pages 6-7</p>	A listing contained in the database that includes multiple data records

Claim Term or Element ^{i, ii}	Claim(s)	Supporting Evidence ^{iii, iv}	Defendants' Proposed Construction ^v
4e	“data record(s)”	<p>18, 24, 25, 36, 38</p> <p><u>File History:</u> 2/10/98 Office Action; Special Edition Using Netscape ; Summary of 7/28/98 Examiner Interview; 8/10/98 Amendment; 12/9/98 Allowance</p> <p><u>Patent:</u> 9:55-10:7; 18:60-66; 19:29-63; 24:29-43; 27:3-6; Tables 7, 8, 9; Figs. 13, 14, and 17; Claims 18-19, 24-25, 27, 29-30, 36.</p> <p><u>Other:</u> Computer Dictionary, Microsoft Press (1997).</p>	One or more fields within an entry (e.g., phone number, address)

ⁱ Defendants have organized their proposed constructions into groups to aid discussion during the meet-and-confer procedures required by the Local Patent Rules. This organization, however, does not imply that Defendants necessarily believe that any of the below terms, clauses, and claim elements must necessarily be construed together with other terms, clauses, and claim elements in the same group. Defendants reserve the right to modify this organization prior to the *Markman* hearing.

ⁱⁱ To the extent that GeoTag identifies any terms for construction that are not identified in this chart, Defendants first reserve the right to supplement their proposed constructions and supporting evidence, and further contend that such terms either (i) do not need to be separately construed given Defendants' proposed constructions or (ii) should be given their plain and ordinary meaning.

ⁱⁱⁱ Notwithstanding the identification of evidence supporting Defendants' proposed constructions, Defendants reserve the right to contend that any of the identified terms or phrases lack written description.

^{iv} Defendants may also rely on any *Markman* briefing, including any *Markman* exhibits and tutorials, and/or Court Orders filed in prior or pending litigation involving the '474 Patent, including but not limited to *Geomas (Int'l) Ltd. v. Idearc Media Services-West, Inc.*, Case No. 2:06-cv-475 (E.D. Tex) and *Microsoft Corp. v. GeoTag, Inc.*, Case No. 1:11-cv-175 (D. Del.). Defendants may also rely on prior testimony by inventors of the '474 Patent or officers, directors, agents, employees, or corporate representatives of GeoTag or any predecessor-in-interest (including but not limited to Geomas (International) Limited, GeoTag Management Group

LLC, and Geomas, Inc.) provided in prior or pending litigation involving the '474 Patent. To the extent required, Defendants may also rely on expert testimony by way of declaration of a person having ordinary skill in the art at the time of invention of the '474 Patent.

^v In the event that GeoTag is granted leave by the Court to amend its Infringement Contentions, or should other terms, clauses, and claim elements become relevant, Defendants reserve the right to modify these constructions. Defendants also reserve the right to modify these constructions should additional information become available through discovery. Further, Defendants reserve the right to modify these constructions in light of arguments made or positions taken by GeoTag as this case proceeds, specifically those taken in *Markman* briefs served by GeoTag in this action and other pending actions.